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U.S. Department of Justice

United States Attorney Eastern District of New York

EDP

F. #2018R02250

271 Cadman Plaza East Brooklyn, New York 11201

February 25, 2023

By Hand Delivery and ECF

The Hon. Nicholas Garaufis United States District Judge Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

Re: United States v. Douglass Mackey

Criminal Docket No. 21-80 (NGG)

Dear Judge Garaufis:

Enclosed please find a signed expert disclosure and documents demonstrating applicable credentials, provided in accordance with Rule 16(a)(1)(G) of the Federal Rules of Criminal Procedure and to supplement the government's February 15, 2023 submission (ECF Dkt. No. 62). The government reserves the right to supplement or correct this disclosure if appropriate. See Fed. R. Crim. P. 16(a)(1)(G)(vi). The government also requests reciprocal discovery from the defendant pursuant to Rule 16(b)(1)(C) of the Federal Rules of Criminal Procedure.

Very truly yours,

BREON PEACE United States Attorney

By: /s/ Erik D. Paulsen

Erik D. Paulsen F. Turner Buford Assistant U.S. Attorneys (718) 254-7000

William J. Gullotta Trial Attorney

(202) 514-1412

Enclosure

cc: Clerk of the Court (NGG) (by ECF)